

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

AMPEX CORPORATION,	)	
	)	
Plaintiff,	)	C.A. No. 04-1373 (KAJ)
	)	
v.	)	
	)	
EASTMAN KODAK COMPANY,	)	
ALTEK CORPORATION and	)	
CHINON INDUSTRIES, INC.,	)	
	)	
Defendants.	)	

**PLAINTIFF'S MOTION FOR A LETTER OF REQUEST PURSUANT  
TO THE HAGUE CONVENTION ON THE TAKING OF EVIDENCE  
ABROAD IN CIVIL OR COMMERCIAL MATTERS**

Plaintiff Ampex Corporation ("Plaintiff"), by counsel, hereby moves for an Order pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil and Commercial Matters for issuance of a Letter of Request to the Appropriate Central Authority requesting that the Authority compel the production of specific documents by Quantel Limited ("Quantel") relating to the circuitry and operation of its products, and related documents

The grounds for this motion, as more fully specified in the Letter of Request submitted herewith, are that Quantel has documents relevant to refuting Defendants' allegations that the patent-in-suit, United States Patent No. 4,821,121 ("the patent-in-suit"), is anticipated or rendered obvious by Quantel's products.

For the reasons set forth above, Plaintiff respectfully requests that the Court enter the attached Order.

MORRIS, NICHOLS, ARSHT & TUNNELL

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December 9, 2005

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**CERTIFICATE OF SERVICE**

I, Julia Heaney, hereby certify that on December 9, 2005, I caused to be electronically filed the foregoing *Plaintiff's Motion For A Letter Of Request Pursuant To The Hague Convention On The Taking Of Evidence Abroad In Civil Or Commercial Matters* with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Paul M. Lukoff, Esquire  
David E. Brand, Esquire  
Prickett, Jones & Elliott, P.A.

and that I caused copies to be served upon the following in the manner indicated:

**BY HAND**

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**BY FEDERAL EXPRESS**

Michael J. Summersgill, Esquire  
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/s/ Julia Heaney  
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